
From: Andrew Parisi <aparisi@summitmidstream.com>
Sent: Monday, April 20, 2015 11:23 AM
To: Way, Steven; Cameron, Gary
Cc: Rockeman, Karl H.; (bogorman@nd.gov); Rene Casadaban; Lucente, Bethany; Brock Degeyter; Art Saunders
Subject: RE: Blacktail Creek - Oil Removal Action - April 15 - 16

Thank you for the summary email Steve. We will respond to your request below in writing to the NDDH by April 27th (as noted in your email). Have a good week

Andrew Parisi

Director of Environmental

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From: Way, Steven [mailto:way.steven@epa.gov]
Sent: Monday, April 20, 2015 9:30 AM
To: Andrew Parisi; Cameron, Gary
Cc: Rockeman, Karl H.; (bogorman@nd.gov); Rene Casadaban
Subject: Blacktail Creek - Oil Removal Action - April 15 - 16

Andrew,

This email is provided as follow up to the discussions that took place onsite and to confirm our conversation on Friday, April 17, 2015 regarding the free phase oil present that EPA and NDDOH observed with Stantec personnel in two locations at the Site. As discussed onsite with NDDOH staff and Stantec personnel, the presence of free phase oil was observed both by the presence of a sheen created on the surface water with minimal disturbance of the ground, and it was observed in the soil along the creek banks between stations 62+00 and 64+00. An oil sheen was also observed along the creek bank / sediment immediately downgradient from the pipeline break point, just upstream of station 32+00. This area is already disturbed into creek bank from the original soil removal action. The area near station 32 appears to contain oil at the toe of the slope of the bank; we did not attempt to define the boundary of this condition. The descriptions of the areas of oil are not intended to suggest that we defined the exact extent of the oil contamination in these areas. It was further requested that if other areas of similar condition exist, then there needs to be a similar determination made as to whether removal of the oil is appropriate.

The oil is visible along both banks from stations 62 to 64, and it was visible in the soil in test cores/pits 12 inches back from the bank and at approximately 8 inches below ground surface. This condition can be expected to discharge oil to the water surface for an indefinite period in the future; there will be little active natural degradation of this oil in the soil matrix below the ground surface. The threat to wildlife in the area associated with the oil on the water will continue including the threat to migratory water fowl observed in the area. Evidence of nesting activity was observed along Blacktail creek during the recent site inspection.

After discussion with NDDOH and Stantec personnel onsite, the recommendation was made to remove the section of creek bank that contains the free phase oil from stations 62 to 64, below the second containment dam. This could be accomplished by cutting the creek bank at slope angle of approximately 2H:1V or flatter if desired. However, the specifics of how to address this oil contamination needs to be evaluated by Summit. The extent of the oil penetration was not fully characterize during the inspection by myself and NDDOH. As to the question of the creek bed needing to be disturbed, that was not discussed. However, in the course of investigating the extent of the appropriate removal action, it could easily be determined if the creek bed contains measurable hydrocarbons that require removal.

The area upstream, near station 32+00, appears to be a relative small section of oil impacted soil / sediment that would be appropriate to remove. This area will require stream bank restoration already due to the previously conducted soil excavation following the pipeline discharge.

The bank disturbance associated with the removal of the oil impacted soil would not be extensive, and the restoration actions would be consistent with other areas disturbed during the response actions that will already require some stabilization and revegetation.

If you have further questions regarding this condition or appropriate response actions, please do not hesitate to contact me. Please provide me and the NDDOH with a response indicating the actions that Summit will implement to address the above described conditions by April 27, 2015.

Sincerely,
Steve

Steven Way
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